

ORIGINAL

June 6, 2024

Via ECF

Hon. Louis L. Stanton  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

MEMO ENDORSED

SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/7/24

**RE: *The City of New York v. Magellan Technology, et al.*, No. 23-5880-LLS-OTW**

Dear Judge Stanton:

We represent Defendants Magellan Technology, Inc., Ectoworld, LLC d/b/a Demand Vape, Matthew J. Glauser, Mahant Krupa 56 LLC, Nikung Patel, and Devang Koya (collectively, "Defendants"), in the above-referenced matter. We write, with Plaintiff's consent, pursuant to Individual Practice Rules 1.A and 1.E, and L.R. 7.1(d), to request a fourteen (14) day extension of time from June 7, 2024, to June 21, 2024, for Defendants to file their answers to Plaintiff's Amended Complaint [ECF No. 20] and to file a motion for reconsideration in part of the Court's May 24, 2024 Opinion & Order [ECF No. 103].

granted and  
So Ordered  
Louis L. Stanton  
6/7/24

Pursuant to the Court's May 24, 2024 Opinion & Order, Plaintiff's May 28, 2024 Letter [ECF No. 104] indicating the City's intention to proceed without amendment, and Local Rule 6.3, Defendants' respective answers to the Amended Complaint and any motion for reconsideration are currently due on June 7, 2024.

Due to several conflicting deadlines and previously scheduled out-of-town depositions in other matters, counsel for Defendants require additional time to adequately address the nuanced subject matter in the Court's Opinion & Order and consult with Defendants to gather additional information necessary to file their answers to the Amended Complaint. The requested extension will provide sufficient time to allow counsel to accommodate the schedules of those out-of-state depositions unrelated to this matter. This is Defendants' first request for an extension, and the City consents to the request.

In the event that the Court grants the consented motion to extend the deadlines, the new deadline for the motion for reconsideration and for the filing of answers will be June 21, 2024, and the City's deadline to respond to the motion for reconsideration would be June 28, 2024.

If the above is satisfactory to the Court, Defendants respectfully request that the requested extensions of filing deadlines be "So Ordered."

Thank you for your attention to this matter.

Respectfully submitted,

/s/Eric N. Heyer

Eric N. Heyer (admitted *pro hac vice*)  
Joseph A. Smith (admitted *pro hac vice*)  
Anna Stressenger (admitted *pro hac vice*)  
Krupa Patel  
THOMPSON HINE LLP  
1919 M Street, N.W., Suite 700  
Washington, DC 20036  
Phone: 202.331.8800

Richard De Palma  
THOMPSON HINE LLP  
300 Madison Avenue  
27th Floor  
New York, NY 10017  
Phone: 212.908.3969

*Counsel for Defendants Magellan  
Technology, Inc., Ecto World, LLC, and  
Matthew J. Glauser*

/s/Paul M. Eckles

Paul M. Eckles  
Barry S. Zone  
Philippe A. Zimmerman  
Moses & Singer LLP  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
Phone: 212.554.7800

*Counsel for Defendants Mahant Krupa 56  
LLC, Nikung Patel & Devang Koya*

---